

LOCKRIDGE GRINDAL NAUEN P.L.L.P.
REBECCA A. PETERSON (241858)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Ludmila Gulkarov, Individually and on)	
Behalf of All Others Similarly Situated,)	Case No. 4:21-cv-00913-YGR
)	
Plaintiff,)	DECLARATION OF REBECCA A.
v.)	PETERSON IN SUPPORT OF
)	ADMINISTRATIVE MOTION TO
Plum, PBC, a Delaware corporation,)	CONSIDER WHETHER CASES
)	SHOULD BE RELATED PURSUANT
)	TO CIVIL LOCAL RULE 3-12
Defendant.)	

I, Rebecca A. Peterson, declare as follows:

1. I am an attorney at Lockridge Grindal Nauen P.L.L.P. and counsel for Ludmila Gulkarov in the above-captioned litigation. I am a member in good standing of the State Bar of California and the Northern District of California. I have personal knowledge of the facts set forth in this Declaration, and, if called as a witness, I could and would testify to them.

2. I am over 21 years of age and am not a party to this action. I submit this Declaration in support of Plaintiff's Administrative Motion to Consider Whether Cases Should Be Related Pursuant to Civil Local Rule 3-12.

1 3. Attached hereto as Exhibit 1 is a true and correct copy of the Class Action
2 Complaint, filed in the above-captioned matter on February 5, 2021 in the United States District
3 Court, Northern District of California. This matter has been assigned to the Honorable Yvonne
4 Gonzalez Rogers.

5 4. Attached hereto as Exhibit 2 is a true and correct copy of the Class Action
6 Complaint, filed in *Kelly McKeon, et al. v. Plum, PBC, et al.* Case No. 3:21-cv-01113 on
7 February 15, 2021 in the United States District Court, Northern District of California. This
8 matter has been assigned to the Honorable Edward M. Chen.

9 5. Counsel for *Kelly McKeon, et al. v. Plum, PBC, et al.* Case No. 3:21-cv-0111
10 agrees to consolidation of the actions.

11 I swear under the penalty of perjury, under the laws of the United States of America that
12 the foregoing is true and correct.

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14
15
16 Executed this 19th day of February, 2021.

17
18 By: /s/ Rebecca A. Peterson
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28 *Attorney for Plaintiff and the Putative Class*